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Attorneys for Plaintiffs

**THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA**

NORTHERN ALASKA
ENVIRONMENTAL CENTER, *et al.*,
Plaintiffs,

v.

DEBRA HAALAND, in her official
capacity as Secretary of the Interior, *et
al.*,

Defendants,

and

AMBLER METALS, LLC, *et al.*,
Intervenor-Defendants.

Case No. 3:20-cv-00187-SLG

**NOTICE REGARDING PLAINTIFFS' POSITION ON ORAL ARGUMENT
(Local Rule 7.1(f))**

Intervenor-Defendant Ambler Metals requested oral argument on the Defendants' Motion for Voluntary Remand. Mot. for Voluntary Remand, ECF No. 113; Ambler Metals, LLC's Response to Federal Defs.' Mot. for Voluntary Remand, ECF No. 129. Plaintiffs do not believe oral argument is necessary and believe the court is in a position to effectively resolve Defendants' Motion for Voluntary Remand based on the parties' pleadings.

Plaintiffs are concerned about continuing delays in the resolution of this case and that oral argument could lead to even further delays. Counsel for Plaintiffs have limited availability for argument over the coming weeks, which could further delay resolution of the matters related to Federal Defendants' Motion for Voluntary Remand. Plaintiffs' counsel are unavailable between April 11–22 and May 2–10, and understand counsel for Federal Defendants is unavailable between April 25–29. If the Court wishes to conduct oral argument, because of those scheduling concerns Plaintiffs respectfully request that the Court not schedule oral argument prior to May 13, 2022.

Respectfully submitted this 8th day of April, 2022.

s/ Suzanne Bostrom

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s/ Roger Flynn (with consent)

Roger Flynn (CO Bar No. 21078) (*pro hac vice*)

WESTERN MINING ACTION PROJECT

Notice re Pls.' Position on Oral Argument

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N. Alaska Env'tl. Ctr. v. Haaland, Case No. 3:20-cv-00187-SLG

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CERTIFICATE OF SERVICE

I certify that on April 8, 2022, I caused a copy of the NOTICE REGARDING PLAINTIFFS' POSITION ON ORAL ARGUMENT to be electronically filed with the Clerk of the Court for the U.S. District Court of Alaska using the CM/ECF system.

s/ Suzanne Bostrom
Suzanne Bostrom